

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEWARD JOHNSON and ARTHUR
BRIGHT,
Plaintiffs,
v.

No. 07 C 7036

C.S. JOHNSON (STAR # 16589), C.M. BADY
(STAR # 11453), TERRY HILLARD, LORI
LIGHTFOOT, PHILIP CLINE, TISA
MORRIS, MAYOR RICHARD DALEY, and
the CITY OF CHICAGO,
Defendants.

JUDGE GUZMAN

INITIAL STATUS REPORT

NOW COME the parties, by and through their respective attorneys and state with regard to the instant status report, the following:

I. A brief summary of the claims asserted in the complaint and any counterclaim or third party complaint.

Plaintiffs make the following claims: On June 21, 2007, Plaintiffs were falsely arrested, maliciously prosecuted, and illegally detained for possession of crack cocaine and DUI. Plaintiff, Johnson, also claims that defendant officers were deliberately indifferent to his medical needs. Plaintiff has also filed additional claims sounding in *Monell*, Equal Protection, Indemnity, and accompanying state law claims.

Defendants have moved to dismiss the complaint on the basis that: Plaintiffs' complaint fails to give notice of the conduct that forms the basis for their claims; Plaintiffs' have not adequately pleaded a *Monell* claim; and that Mayor Daley, and other supervisory officials have been sued in their official capacity and should be dismissed. Defendant City also has filed a

motion to bifurcate the Section 1983 *Monell* claims against it and to stay discovery and trial on those claims.

II. A brief statement of the relief sought, including itemization of damages, if available.

Plaintiffs seek medical expenses, emotional damages, and other damages for their false arrest and other claims in addition to damages for the Defendants' conspiratorial actions.

III. Whether the parties will consent to trial before a magistrate judge.

The parties have not consented to trial before a magistrate judge.

IV. The status of settlement negotiations, if any.

The parties have not engaged in settlement conversations.

V. Proposed discovery plan.

- a. Rule 26(a) Disclosures shall be due from both parties by March 14, 2008
- b. Interrogatories and Requests to Produce to be issued by March 21, 2008 and answered by April 23, 2008.
- c. Fact witnesses to be deposed by July 25, 2008.
- e. Expert disclosures by August 13, 2008, deposed by September 5, 2008.
- f. Rebuttal experts disclosed by September 19, 2008, deposed by October 7, 2008.
- g. The City states that a substantial additional period of time would be necessary to complete *Monell* discovery in the event the City's Motion to Bifurcate is denied.

/s/ Abbas Merchant
On behalf of Plaintiffs

/s/ Daniel Noland
On behalf of Defendants, S. JOHNSON (STAR # 16589), C.M. BADY (STAR # 11453), MAYOR RICHARD DALEY, TERRY HILLARD, LORI LIGHTFOOT, PHILIP CLINE, and TISA MORRIS and the CITY OF CHICAGO

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